



Annual Action Plan

The CPMP Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations.

Narrative Responses

ACTION PLAN

Annual Action Plan includes the [SF 424](#) and is due every year no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Executive Summary 91.220(b)

1. The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

The city of West Lafayette receives funding from the U.S. Department of Housing and Urban Development (HUD) each year to encourage affordable housing development, sustain affordable housing, support economic development efforts, prevent homelessness, and help people living with HIV/AIDS. Once every five years the city of West Lafayette must conduct an assessment of the needs of the community and develop strategies for utilizing the funds they will receive, as required by HUD, in a Consolidated Plan. The document serves to meet that requirement and outline goals and methods for helping distress neighborhoods re-build. Each year, the city of West Lafayette must create an Action Plan document that spells out the specific activities and resources it will use to reach the five-year goals in the Consolidated Plan. The current Consolidated Plan covers the years 2010 through 2014. This Action Plan is the 2nd year of that 5 year plan.

The city of West Lafayette is located within Tippecanoe County, Indiana. Tippecanoe County is a primarily rural community along Interstate 65, northwest of Indianapolis. West Lafayette is what the U.S. Department of Housing and Urban Development (HUD) calls an entitlement city because the city receives an allocation of the Community Development Block Grant (CDBG) funds each year. Funding is allocated to Lafayette based on formulas calculating data from the U.S. Census, including the need in the community, the general population numbers, the number of pre-1940's housing stock and other general information.

In conjunction with the city of Lafayette, the neighbor directly to the east, the city of West Lafayette, will also receive an annual allocation of HOME funds. The unincorporated areas in Tippecanoe County, the township of Battle Ground, Lafayette, and West Lafayette have formed a consortium to share an annual allocation of HOME Investment Partnerships Program (HOME) dollars. This grouping of leaders is called the HOME Consortium. The staff at the city of Lafayette is responsible for the implementation and administration of the HOME funds at the behest of the

HOME Consortium. Levels of funding and projects funded by the HOME Consortium will be discussed in the city of Lafayette 2011 Action Plan.

Typically, the City of West Lafayette would estimate the amounts of each grant based on the federal budget passed in September of the previous year, in this case, September of 2010. However, the federal government has not passed a budget for the 2011 year at the time the draft document was released for public comment. With numerous cuts in program dollars expected, the City of West Lafayette estimated three different funding levels at the time of the draft to give possible grantees the idea of the amount of the award for 2011. The Federal budget passed in April and the estimated funding is now available for the final narrative document. Projects have been contingently awarded based on approval of this document by the Department of Housing and Urban Development.

Program	2010 Funding	2011 Funding	% Change
CDBG	\$477,115	\$399,010	-16.37%

Over the next year, the city of West Lafayette will work towards the following goals and strategies, pending receiving the maximum CDBG funding. The annual goals will be reduced if funding for the 2011 year is reduced. The 2011 Action Plan will outline the methods, projects, and programs for accomplishing them.

1. Stabilize homeownership within West Lafayette.

Strategy	One-Year Goal
Provide repairs for homeowners who are unable to save for large repairs, targeting households under 80 percent of the area median income.	10 units
Rehabilitate homes for homeownership within CHDO service areas to balance against increasing student housing and other rental housing.	3 units
Assist with lead-based paint testing and abatement of lead-based paint from homes with small children via home repair.	1 household

2. Encourage responsible rental unit creation and maintenance.

Strategy	One-Year Goal
Form a partnership with Purdue University to create additional, stable student housing to meet increasing demand.	Meet Quarterly
Provide tenant counseling to educate tenants on rights in foreclosure of homes and legal responsibilities for caring for the home.	Host one meeting annual

3. *Amended:* Support programs that serve the homeless and advocate on behalf of the homeless population.

Strategy	One-Year Goal
Support case management and other services for people who are homeless or at-risk of homelessness.	200 people
Continue participation in the Homelessness Intervention and Prevention Network (HIPN) monthly meetings to meet this goal.	10 meetings

4. Support the needs of people living with HIV/AIDS and their families.

Strategy	One-Year Goal
Form a partnership with local service providers to access funding that will support services and housing for persons living with HIV/AIDS	Find 1 additional funding resource

5. Support social services that meet the basic needs of low income families and households.

Strategy	One-Year Goal
Support social service programs that provide case management and other supportive services for low to moderate income households	1,000 people

6. Improve public infrastructure and public facilities.

Strategy	One-Year Goal
Support beautification efforts throughout the community, targeting low to moderate-income neighborhoods	1 neighborhood
Increase the number of ramps and curb cutouts on public streets to comply with the Americans with Disabilities Act (ADA)	200 people
Support the improvement of public facilities and infrastructure.	200 people

7. Encourage economic development activities.

Strategy	One-Year Goal
Assist businesses with façade renovations	1 business

The final goal does not have specific measurable outputs. This goal instead addresses the desire of the city of West Lafayette to continue its working relationship with the city of Lafayette and improve upon the current coordination efforts. Below is the goal, strategies, objective, and outcome.

8. Improve administration and coordination between the cities of Lafayette and West Lafayette.

Strategy
Coordinate public meetings to compliment each other's Consolidated Planning efforts and utilize all meetings as a way to provide citizen input to each other's plans
Coordinate volunteer efforts to help both communities and reach all low to moderate income census tracts
Develop stronger relationships with other HUD entitlement cities to share ideas and expertise. Use this network on a bi-annual basis to improve efforts in the local community.

Citizen Participation 91.220(b)

2. Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan.
3. Provide a summary of citizen comments or views on the plan.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

The citizen participation process for the 2011 Action Plan was more limited than the previous year because of the plan only covering one year of the 2010-2014 Consolidated Plan. The city of West Lafayette conducted public meetings through the months of February and March 2011 to present ideas and projects for possible funding. Attendance from local service providers and advocacy groups was high. Staff held meetings on the following dates:

City	Date	Time	# of Attendees
West Lafayette	February 10, 2011	6:30 PM	21
West Lafayette	March 9, 2011	6:30 PM	9

Due to the staff's participation in a large number of advocacy groups, such as the Homelessness Intervention and Prevention Network, the Human Relations Commission and the HOME Consortium, the West Lafayette staff is continually aware of the changes and needs of the community and people the CDBG funds are intended to serve. The citizen participation process goes year long, rather than for a period of time surrounding the development of the Action Plan.

The city of West Lafayette hired an independent contract, City Consultants & Research, LLC to help compose the 2011 Action Plan. During that process, the independent contractor did conduct phone consultations with some stakeholders. Listed below are the people and organizations contacted.

Name	Organization
Catherine Moran	The Center @ Jenks Rest
Lori Dimick	Indiana Housing and Community Development Authority
Vida Hoyer	Lafayette Housing Authority
Donna Collier	Area IV Agency

The Cities of West Lafayette and Lafayette also utilized the efforts of a Ball State University graduate student intern to determine the areas in which citizen participation can improve. The focus of the project was the desire to combine traditional techniques, such as public hearings, media releases, task forces, with newer digital technique, whether it be the use of social media, information hotlines, discussion boards, mobile applications, to reach the growing digital population. In order to understand how people of Lafayette participate and understand why they do not participate, the intern administered a survey to a random sample of 500 people. 400 addresses were selected at random from the City's utility mailing list and 100 were handed out at City meetings and mailed to people on the NOFA mailing list as well as being available at the Community & Economic Development Office. Appendix A has a copy of the survey instrument the intern used.

The intern is also reviewing the current citizen participation plan and is establishing a set of recommendations based on survey results. This information will go beyond the use for the Consolidated Planning process and help other City offices to attract more people. Recommendations will be presented to City staff after the release of this draft document. However, from the initial information collected, the need to incorporate more technology will be incorporated into the revised citizen participation plan. Technology examples include information hot-lines for larger issues and eGov applications.

The City of West Lafayette released a draft copy of this document for public comment on March 26, 2011. Copies were available on the City's website as well as in the Development Department offices. The City of West Lafayette did not receive any comments or questions about this document.

Resources 91.220(c)(1)) and (c)(2)

5. Identify the federal, state, and local resources (including program income) the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.
6. Explain how federal funds will leverage resources from private and non-federal public sources.

The city of West Lafayette is located within Tippecanoe County, Indiana. Tippecanoe County is a primarily rural community along Interstate 65, northwest of Indianapolis. West Lafayette is what the U.S. Department of Housing and Urban Development (HUD) calls an entitlement city because the city receives an allocation of the Community Development Block Grant (CDBG) funds each year. Funding resources from HUD are allocated to the cities based on formulas calculating data from the U.S. Census, including the need in the community, the general population numbers, the number of pre-1940's housing stock, and other general information.

Tippecanoe County is also home to four incorporated towns, Battle Ground, Dayton, Clarks Hill, and Shadeland. The unincorporated areas in the county, Battle Ground, Lafayette, and West Lafayette have formed a consortium to share an annual allocation of HOME Investment Partnerships Program (HOME) dollars. This grouping of leaders is called the HOME Consortium. Other areas wanting to be admitted to the HOME Consortium had until March 11, 2011 to apply. No additional areas applied to be a part of the HOME Consortium. The staff at the city of Lafayette is responsible for the implementation and administration of the HOME funds at the behest of the HOME Consortium. All further information regarding the HOME grant will be discussed in the Action Plan published by the city of Lafayette.

Table I-I shows the types of grants that will serve the city of West Lafayette, the expected amount, and eligible uses. This document will serve as a guideline for how the city of West Lafayette will spend those dollars in 2011.

Table I-I: Annual Allocations of Grant Dollars for the City of West Lafayette, 2010.

Source	Eligible Use	2011 Allocation	Five Year Estimate
CDBG	Supply decent housing, expand economic opportunities, and provide services for persons earning 80 percent or less of median family income. Eliminate slum and blight.	\$399,010	\$2,385,000

Social service providers, including those who serve the homeless and people living with HIV/AIDS, rely on other sources of funding. There are 23 agencies that receive financial support from the United Way of Greater Lafayette and some of those agencies also apply to the State of Indiana for other resources, many of which also come from the U.S. Department of Housing and Urban Development. However, agencies must submit competitive applications to receive these funds over other agencies throughout the state of Indiana. For many of the social service agencies, the total funding they will acquire over the next year will exceed \$5 million of private and public resources.

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Annual Objectives 91.220(c)(3)

***If not using the CPMP Tool:** Complete and submit Table 3A.

***If using the CPMP Tool:** Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls

Goals and objectives to be carried out during the action plan period are indicated by placing a check in the following boxes.

<input checked="" type="checkbox"/>	Objective Category Decent Housing Which includes:	<input checked="" type="checkbox"/>	Objective Category: Expanded Economic Opportunities Which includes:	<input checked="" type="checkbox"/>	Objective Category: Expanded Economic Opportunities Which includes:
<input checked="" type="checkbox"/>	assisting homeless persons obtain affordable housing	<input checked="" type="checkbox"/>	improving the safety and livability of neighborhoods	<input type="checkbox"/>	job creation and retention
<input type="checkbox"/>	assisting persons at risk of becoming homeless	<input type="checkbox"/>	eliminating blighting influences and the deterioration of property and facilities	<input checked="" type="checkbox"/>	establishment, stabilization and expansion of small business (including micro-businesses)
<input checked="" type="checkbox"/>	retaining the affordable housing stock	<input type="checkbox"/>	increasing the access to quality public and private facilities	<input type="checkbox"/>	the provision of public services concerned with employment
<input type="checkbox"/>	increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability	<input type="checkbox"/>	reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods	<input type="checkbox"/>	the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan
<input type="checkbox"/>	increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/ADOS) to live in dignity and independence	<input type="checkbox"/>	restoring and preserving properties of special historic, architectural, or aesthetic value	<input type="checkbox"/>	availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices
<input type="checkbox"/>	providing affordable housing that is accessible to job opportunities	<input type="checkbox"/>	conserving energy resources and use of renewable energy sources	<input type="checkbox"/>	access to capital and credit for development activities that promote the long-term economic social viability of the community

7. Provide a summary of specific objectives that will be addressed during the program year.

The goals set in the 2010-2014 Consolidated Plan cover the city of West Lafayette as well as the city of Lafayette and the entire HOME Consortium. For the purpose of this document, the strategies listed are only those for which the city of West Lafayette will be administratively responsible. The objectives and goals will be addressed with the 2011 allotment of CDBG dollars. The one-year goal will be obtainable if the allocation remains level at \$477,115.

However, with a possible reduction in funding, the one-year goal will be reduced by the percentage of funding. Those numbers are listed in parenthesis in the coming charts by the percent of reduction/allocation in funding.

Objective categories and outcomes have been selected for the city of West Lafayette by HUD. There are three objective categories and three outcome categories. The three objective categories are:

1. Providing decent housing
2. Creating a suitable living environment
3. Creating economic opportunities

Three outcomes are measured under each of the three objectives. The outcomes are:

1. Improving availability or accessibility of units or services
2. Improving affordability not just of housing but also of other services
3. Improving sustainability by promoting viable communities

Every goal, strategy and project must meet one of the above objectives and outcomes. The goals and strategies show the one-year measurable outcome under the above HUD measurements for the 2011 fiscal year.

1. Stabilize homeownership within West Lafayette.

Strategy	One-Year Goal	Objective	Outcome
Provide repairs for homeowners who are unable to save for large repairs, targeting households under 80 percent of the area median income.	10 units	Decent Housing	Sustainability
Rehabilitate homes for homeownership within CHDO service areas to balance against increasing student housing and other rental housing.	3 units	Decent Housing	Availability/ Accessibility
Assist with lead-based paint testing and abatement of lead-based paint from homes with small children via home repair.	1 household	Decent Housing	Sustainability

2. Encourage responsible rental unit creation and maintenance.

Strategy	One-Year Goal	Objective	Outcome
Form a partnership with Purdue University to create additional, stable student housing to meet increasing demand.	Meet Quarterly	Decent Housing	Availability/ Accessibility
Provide tenant counseling to educate tenants on rights in foreclosure of homes and legal responsibilities for caring for the home.	Host one annual meeting	Suitable Living Environment	Availability/ Accessibility

9. *Amended:* Support programs that serve the homeless and advocate on behalf of the homeless population.

Strategy	One-Year Goal	Objective	Outcome
Support case management and other services for people who are homeless or at-risk of homelessness.	200 people	Suitable Living Environment	Availability/ Accessibility
Continue participation in the Homelessness Intervention and Prevention Network (HIPN) monthly meetings to meet this goal.	10 meetings	Suitable Living Environment	Availability/ Affordability

3. Support the needs of people living with HIV/AIDS and their families.

Strategy	One-Year Goal	Objective	Outcome
Form a partnership with local service providers to access funding that will support services and housing for persons living with HIV/AIDS	Find 1 additional funding resource	Suitable Living Environment	Availability/ Affordability

4. Support social services that meet the basic needs of low income families and households.

Strategy	One-Year Goal	Objective	Outcome
Support social service programs that provide case management and other supportive services for low to moderate income households	1,000 People	Suitable Living Environment	Availability/ Accessibility

5. Improve public infrastructure and public facilities.

Strategy	One-Year Goal	Objective	Outcome
Support beautification efforts throughout the community, targeting low to moderate-income neighborhoods	1 neighborhood	Suitable Living Environment	Availability/ Accessibility

Increase the number of ramps and curb cutouts on public streets to comply with the Americans with Disabilities Act (ADA)	200 people	Suitable Living Environment	Availability/Accessibility
Support the improvement of public facilities and infrastructure.	200 people	Suitable Living Environment	Availability/Accessibility

6. Encourage economic development activities.

Strategy	One-Year Goal	Objective	Outcome
Assist businesses with façade renovations	1 business	Economic Opportunity	Sustainability

The final goal does not have specific measurable outputs. This goal instead, addresses the desire of the city of West Lafayette to continue its working relationship with the city of Lafayette and improve upon the current coordination efforts. Below is the goal, strategies, objective, and outcome.

7. Improve administration and coordination between the cities of Lafayette and West Lafayette.

Strategy	Objective	Outcome
Coordinate public meetings to compliment each other's Consolidated Planning efforts and utilize all meetings as a way to provide citizen input to each other's plans	Suitable Living Environment	Sustainability
Coordinate volunteer efforts to help both communities and reach all low to moderate income census tracts	Suitable Living Environment	Sustainability
Develop stronger relationships with other HUD entitlement cities to share ideas and expertise. Use this network on a bi-annual basis to improve efforts in the local community.	Suitable Living Environment	Sustainability

Description of Activities 91.220(d) and (e)

***If not using the CPMP Tool:** Complete and submit Table 3C

***If using the CPMP Tool:** Complete and submit the Projects Worksheets and the Summaries Table.

8. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability).

The city of West Lafayette will complete the following projects in 2011. Awards for these projects are subject to change from the public comment period and approval by the city of West Lafayette Council. Complete project worksheets are included as Appendix C.

Organization	2011 Estimated Funding	Objective Category	Outcome Category
<i>Public Services - Total</i>	<i>\$59,845</i>		
Lafayette Urban Ministry	\$6,606	Decent Housing	Availability/ Accessibility
Mental Health America	\$7,024	Decent Housing	Availability/ Accessibility
Lafayette Transitional Housing Center, Inc.	\$6,606	Decent Housing	Availability/ Accessibility
Lafayette Transitional Housing Center, Inc.	\$4,097	Decent Housing	Availability/ Accessibility
YWCA	\$4,766	Sustainable Living Environment	Availability/ Accessibility
The Center at Jenks Rest	\$4,935	Sustainable Living Environment	Availability/ Accessibility
Food Finders Food Bank	\$4,097	Sustainable Living Environment	Availability/ Accessibility
Riggs Community Health Center, Inc.	\$2,425	Sustainable Living Environment	Availability/ Accessibility
Tippecanoe County Child Care, Inc.	\$16,446	Sustainable Living Environment	Availability/ Accessibility
Family Services, Inc.	\$2,843	Sustainable Living Environment	Availability/ Accessibility

Organization	2011 Estimated Funding	Objective Category	Outcome Category
<i>Admin/Housing/Infrastructure - Total</i>	\$339,165		
WL Dept. of Development	\$79,800	Not Applicable	Not Applicable
WL Dept. of Engineering	\$164,365	Suitable Living Environment	Sustainability
WL Fire Department	\$25,000	Suitable Living Environment	Sustainability
New Chauncey Housing, Inc.	\$70,000	Decent Housing	Affordability

Geographic Distribution/Allocation Priorities 91.220(d) and (f)

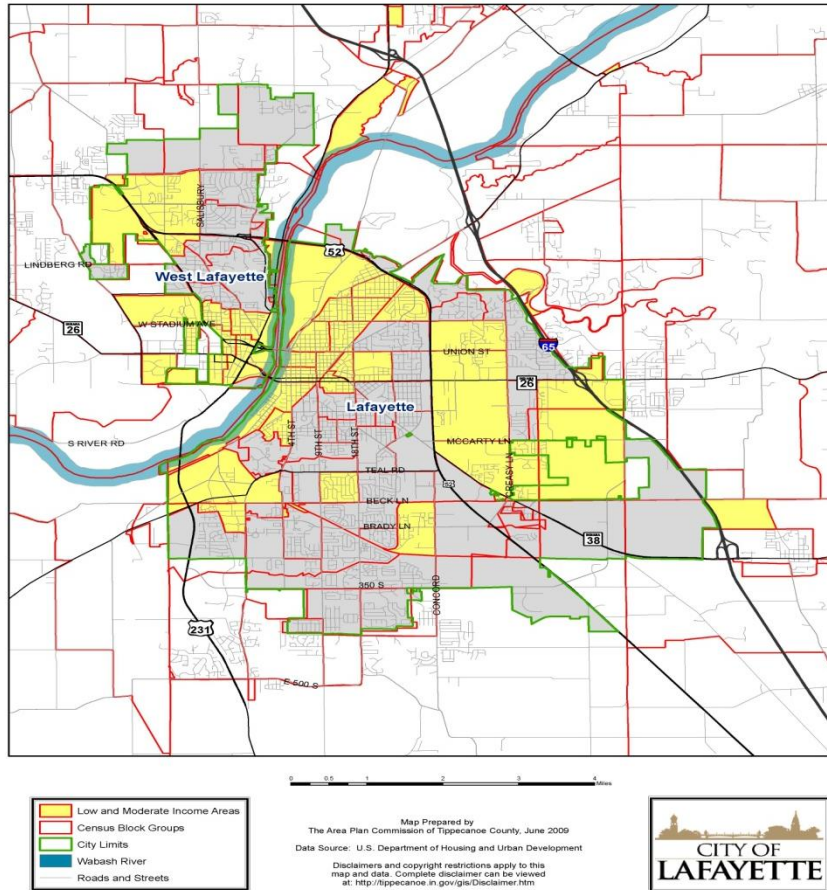
9. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
10. Describe the reasons for the allocation priorities, the rationale for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) during the next year, and identify any obstacles to addressing underserved needs.

According to the 2010 Census, Tippecanoe County was home to 172,780 individuals. That is a 15.9 percent increase from the 2000 census. Other information from the 2010 census was not readily available at the time of this document's publication. The city of West Lafayette is home to Purdue University and is located on the west side of Lafayette, with a river separating the two cities geographically. It is the second largest incorporated area within Tippecanoe County. An estimated 29,596 people call West Lafayette home, in addition to the student population. Table III-I shows the population growth of Tippecanoe County and the cities since 1990.

*Table III-I:
Estimated
Population by
CDBG City and
County.
Source: U.S.
Census and
STATS Indiana.*

	1990	2000	2010	Change from 1990-2010
Lafayette	43,764	60,525	67,140	53.4%
West Lafayette	25,907	28,778	29,596	14.2%
Tippecanoe County	130,598	148,955	172,780	32.2%

The city of Lafayette and West Lafayette have a number of low to moderate-income census tracts located within their borders. A low to moderate-income census tract is defined as a census tract with 51 percent or more of the population earning incomes below 80 percent of the median family income. Priorities for activities that benefit a whole neighborhood, such as infrastructure improvement and park facility upgrades are reserved for these areas. Figure III-I shows the area of low to moderate census tracts.



*Figure III-I:
Concentration
of Low to
Moderate
Income
Census Tracts.
Source: The
Area Planning
Commission of
Tippecanoe
County, 2009.*

From the 2010 census, the basic racial makeup of West Lafayette is 76.8% White, 2.7% African American, 17.3% Asian, and 3.1% other racial minorities, which is comprised of the typical racial/ethnic categories found in the Census. These categories include: (1) American Indian and Alaska Native, (2) Native Hawaiian and Other Pacific Islander, and (3) Other. All racial minorities increased in number with the Asian population increase the most. The Asian population in all of Tippecanoe County grew by 41 percent from the 2000 Census to the 2010 Census. The presence of the university may account for such a large growth in minority population in a primarily white populated county.

The 2010 Analysis of Impediments reviewed the concentration of minorities within Tippecanoe County. Regardless of race or ethnicity, the statistical impact of minorities is solely within the borders of the cities of Lafayette and West Lafayette. Because these minorities represent such a small portion of the population and do not make up a concentration in the community any larger than 15 percent, the cities of Lafayette and West Lafayette must find ways to target these minorities to inform them of available beneficial programs.

Funding for programs will be directed to programs and projects that meet the following criteria:

- Meet a goal of the 2010-2014 Consolidated Plan

- Demonstrate a significance of need
- Serve an eligible area within Tippecanoe County or the cities of Lafayette and West Lafayette, depending on the grant used
- Project or program is eligible under HUD rules
- Create a visual impact in the neighborhood, particularly if an infrastructure project
- Benefits persons at-risk of homelessness or who are homeless
- Benefits a special needs population
- Serves a low to moderate income census tract

Activities and projects that meet all the above criteria receive the highest priority, reducing the amount of funding spent on programs or projects that meet only few or none of the above criteria.

One of the most difficult tasks the cities of Lafayette and West Lafayette have is finding enough adequate funding to meet the underserved needs. Both cities strive to support as many programs as possible; however, by doing so the limited funds they currently receive do not support the demand for services. Funding may be adequate enough to provide the direct services to the client, but it may not cover the administrative expenses that come with providing the services to the client.

Another obstacle for some of the housing developers in the area is securing enough funding to meet the match requirements of the HOME program. The HOME program usually requires that the developer match 25 cents for every dollar awarded. This is an obstacle for some of the local non-profit housing developers as they only able to complete smaller scale projects every year, rather than leveraging large projects as are often found in larger cities.

Annual Affordable Housing Goals 91.220(g)

***If not using the CPMP Tool:** Complete and submit Table 3B Annual Housing Completion Goals.

***If using the CPMP Tool:** Complete and submit the Table 3B Annual Housing Completion Goals.

11. Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

The city of West Lafayette will utilize CDBG dollars primarily to sustain affordable housing and to renovate vacant homes for homeownership. Because of the high rental rates in the community as a result of Purdue University, increasing and preserving homeownership is a high priority. According to the 2010-2014 Consolidated Plan, 67.3 percent of housing units are occupied by renters. Only 32.7 percent of residential units are homeowner occupied.

Rather than create new rental units, the city of West Lafayette will form a partnership with Purdue University to address the growing need to preserve homeownership in the area and balance that against the growing demand and need for student rental housing.

The following are housing goals to be accomplished in the next year. Table 3-B is included as part of Appendix D.

1. Stabilize homeownership within West Lafayette.

Strategy	One-Year Goal	Objective	Outcome
Provide repairs for homeowners who are unable to save for large repairs, targeting households under 80 percent of the area median income.	10 units	Decent Housing	Sustainability
Rehabilitate homes for homeownership within CHDO service areas to balance against increasing student housing and other rental housing.	3 units	Decent Housing	Availability/ Accessibility
Assist with lead-based paint testing and abatement of lead-based paint from homes with small children via home repair.	1 household	Decent Housing	Sustainability

2. Encourage responsible rental unit creation and maintenance.

Strategy	One-Year Goal	Objective	Outcome
Form a partnership with Purdue University to create additional, stable student housing to meet increasing demand.	Meet Quarterly	Decent Housing	Availability/ Accessibility
Provide tenant counseling to educate tenants on rights in foreclosure of homes and legal responsibilities for caring for the home.	Host one meeting annual	Suitable Living Environment	Availability/ Accessibility

Public Housing 91.220(h)

12. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
13. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

The Lafayette Housing Authority serves all of Tippecanoe County. It does not have any public housing developments of its own and only administers programs related to the Section 8 Housing Choice Voucher program. The mission of the Lafayette Housing Authority is to:

- Provide affordable housing opportunities
- To stimulate the development of and increase the availability of affordable housing
- To ensure safe and decent housing for program participants
- To promote self-sufficiency and independence
- To be fiscally responsible
- To perform these charges without discrimination and with respect to the people it serves

The Lafayette Housing Authority will continue four main programs to benefit low to moderate income clients. Three of these programs are executed through the use of Section 8 Housing Choice Vouchers. One program is supported by the HOME Consortium and the city of Lafayette.

Section 8 vouchers, from the U.S. Department of Housing and Urban Development (HUD) allow households to access housing that would not be affordable to them. The household pays 30 percent of their gross monthly income and the voucher pays the remainder of the rent owed to the landlord. 1,231 people benefit from this program and 1,017 people are waiting for a voucher. The Lafayette Housing Authority estimates that a household will have to wait 13-18 months to receive a voucher. Since the Lafayette Housing Authority is only allotted an annual amount, a household must “graduate” to self-sufficiency and/or move to another location to free up a voucher for someone on the waiting list.

The Lafayette Housing Authority also offer a program with the use of the Housing Choice Vouchers towards homeownership. The Section 8 Homeownership program assists households that are working towards self-sufficiency or have established good credit and have taken a homebuyer education class to use their voucher towards homeownership. The rules are the same as the traditional Housing Choice Voucher program; however, the voucher is used to help pay monthly mortgage payments instead of rent.

Tenant Based Rental Assistance works in the same manner as the basic Section 8 Housing Choice voucher program. Funding for this program is provided by the HOME funds awarded by the HOME Consortium and administered by the City of Lafayette. These funds help close the gap on the waiting list by providing assistance for one year before a Section 8 Housing Choice Voucher becomes available for the household. This enables approximately 10 households to come off the waiting list early and receive assistance.

The Lafayette Housing Authority does not have a troubled status.

Homeless and Special Needs 91.220(i)

14. Describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness.
15. Describe specific action steps to address the needs of persons that are not homeless identified in accordance with 91.215(e).
16. Homelessness Prevention—Describe planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

To address homelessness, the city of West Lafayette must use a two-prong approach. The first method is to address homelessness at the local level. The second method is to participate in homelessness prevention at the state level and participate in the Balance of State Continuum of Care. Through the state of Indiana, the area can assess the homeless problem with a housing first approach and access federal resources directed specifically to homelessness.

At the local level, the cities of Lafayette and West Lafayette participate on the Homelessness Intervention and Prevention Network (HIPN) that include service providers, non-profit housing developers, private foundations, and the Lafayette Housing Authority. Twenty-one people, representing various local organizations, meet on a monthly basis to coordinate efforts of each of the agencies and grantors as well as address new needs of the homeless population. Some of the initiatives the HIPN are working towards include:

- Developing a winter contingency plan to meet the needs of all homeless individuals
- Easing restrictions on some shelters and ensuring emergency shelters and homeless providers meet the needs of all homeless sub-populations
- Advocating for individuals who need homelessness services but may not meet the federal definition of homelessness because they sleep on sofas or share residences with friends.
- Connecting individuals utilizing services to other services that may be of assistance
- Coordinating efforts to ensure an entire Continuum of Care, from the streets to permanent housing, is in place
- Follow the "housing first" plan of the state-wide continuum of care to provide permanent housing, including permanent supportive housing for the chronically homeless
- Seek alternative sources to support the agencies that serve the homeless population in the area

Beginning in 2011, the Indiana Housing and Community Development Authority (IHCDA) will begin to restructure how local planning groups, such as HPIN, operate. The IHCDC office is responsible for providing Emergency Shelter Grants and Continuum of Care funds from HUD to areas of the state not receiving those funds directly. IHCDC serves the balance of the State of Indiana. Previously, the organizations at the local level dictated how they would structure themselves administratively to guide and to fund homelessness programs. In 2011, the local groups will begin duplicating the structure used at the state planning level. The new structure will be called a

regional planning council and include new advocacy groups from the educational, medical and veteran services sectors. The regional planning council will work directly with the state in determining the plan to address the needs of homeless individuals, developing funding streams for projects and creating a pipeline of projects to serve the area.

Beyond the scope of administration and planning, the city of West Lafayette will utilize CDBG public service dollars to fund social services. These service organizations will support programs funded by the state of Indiana Emergency Shelter Grant dollars and Continuum of Care dollars, alternative grants from the U.S. Department of Housing and Urban Development. Public dollars, matched by funding from the United Way of Greater Lafayette and other private resources will help achieve the following strategies to end homelessness.

1. **Amended:** Support programs that serve the homeless and advocate on behalf of the homeless population.

Strategy	One-Year Goal	Objective	Outcome
Support case management and other services for people who are homeless or at-risk of homelessness.	200 people	Suitable Living Environment	Availability/ Accessibility
Continue participation in the Homelessness Intervention and Prevention Network (HIPN) monthly meetings to meet this goal.	10 meetings	Suitable Living Environment	Availability/ Affordability

2. Support the needs of people living with HIV/AIDS and their families.

Strategy	One-Year Goal	Objective	Outcome
Form a partnership with local service providers to access funding that will support services and housing for persons living with HIV/AIDS	Find 1 additional funding resource	Suitable Living Environment	Availability/ Affordability

3. Support social services that meet the basic needs of low-income families and households.

Strategy	One-Year Goal	Objective	Outcome
Support social service programs that provide case management and other supportive services for low to moderate income households	1,000 people	Suitable Living Environment	Availability/ Accessibility

Understanding homelessness and the causes of homelessness is an obstacle when trying to educate the general population. From the consultation process in 2010, the city of West Lafayette learned that serving as an advocate and educator was a need in the community. Many people did not understand the true picture of homelessness in the community. Rather, the popular picture was a beggar on the street, when in reality the homeless person is a working person who may be in a shelter and have family. The first goal, *support programs that educate neighbors on what to do to help homeless neighbors or neighbors who are at risk of becoming homeless*, strives to

address this need by not only serving the homeless neighbors but also work to help the general population understand who is homeless and how the entire community can help these neighbors.

The city of West Lafayette asked applicants how they would implement harm reduction policies into their program. A harm reduction policy is to allow clients who are intoxicated and non-violent to enter a program. Sobriety is not a requirement of entrance to the program, and the service provider will work with the client to overcome his or her substance abuse issue as part of the cause of his or her homeless experience. The client must be non-violent and not pose a threat to other clients receiving services. These policies account for the quality of the individual and community around that individual as criteria for successful intervention and cessation of substance use. Meaning individuals who are not sober but are in destructive communities need social service assistance immediately, rather than risking their health and life until they can achieve complete sobriety.

With elevated unemployment for people not associated with Purdue University, the city of West Lafayette finds providing the basic needs of the residents is the primary method used to bridge the gap between jobs. Meeting these basic needs is a priority for fighting poverty. The cities of Lafayette and West Lafayette, as well as the HOME Consortium will strive for the goals and strategies below to help households stay out of poverty or become self-sufficient and elevate themselves from living in poverty.

- Promote economic empowerment by supporting facilities, services, and activities aimed at developing the self-sufficiency of all low to moderate income residents. Programs and activities to be funded over the next five years include:
 - Child care services
 - Healthcare
 - Family self-sufficiency programs
 - Homeless prevention programs
 - Food banks
- Provide economic development opportunities to low to moderate income families. Programs and activities to be funded over the next five years include:
 - The creation of jobs through city incentives
 - Job training programs
 - Assist businesses with improvements and job creation
 - Promote Section 3 opportunities in current housing projects
- Provide affordable housing opportunities to low and moderate income families
- Continue to work with agencies to identify barriers and issues related to poverty and support programs that will help low to moderate income families overcome those barriers.

Some homeless individuals come from high-risk situations. Their background increases their chances of becoming homeless, such as aging from the foster care system or being released from prison. The people exiting from these situations tend to have little guidance for becoming self-

sufficient. Many of these programs already have existing policies to help these individuals cope with the transition from the public systems to self-sufficiency. In an effort to not duplicate efforts of the public systems, the local network must follow those policies and develop social services that support but not copy those efforts. The city of West Lafayette has no formal discharge policy from public institutions; however, the Homeless Intervention and Prevention Network, which includes the City and local service agencies, follow the state of Indiana policies.

- Foster Care:

Each state must write a Chafee Plan outlining the state's plan to implement the Foster Care Independence Act of 1999 (FCIA). The law assists young people transition from foster care to stable housing, as well as receive services. The State of Indiana's Plan provides youth ages 14-18 with independent living services, preparing them to live as healthy, productive and responsible lives as self-sufficient adults. Each youth has a comprehensive independent living assessment which identifies strengths and areas for improvement. Services are geared to assist the youth in areas needing improvement. Services include financial, housing, mentoring, counseling, employment, education and other appropriate support.

- Health Care:

The following is the discharge policy plan concerning those with developmental disabilities from health facilities operated by the state of Indiana:

It is the policy of the Bureau of Quality Improvement Services that all individuals moving from State Operated Facilities, Large Private ICF/MR settings and nursing homes be monitored to assure that the transition is proceeding smoothly, that the individuals' Individualized Support Plan is being implemented appropriately, and that any concerns that occur during the transition are dealt with quickly. Individuals transitioning from a state operated facility are surveyed six months after the post transition process is completed, using the residential services and supports survey instrument. Additionally, tracking/monitoring of specialty evaluations occurring during the transition process is performed for individuals transitioning from State Operated Facilities.

- Mental Health:

Formal protocol has been implemented for individuals being discharged from state institutions of care under statute: IC-12-21-2-3. Other protocols are being developed for each individual Community Mental Health Center in Indianapolis. The Indiana Family and Social Services Administration, Division of Mental Health and Addition policy implemented their policy in October 2003. The policy directs that it is the responsibility of the Gatekeeper to develop a discharge plan and to assure that no person leaving a state-operated institution will be discharged to homelessness. The state operated facility staff develops the discharge plan and consumer participation in development of the plan is documented. This policy applies to patients who are transferred to or discharged from a state institution administered by the Division of Mental Health.

- Corrections:*

The following is the discharge policy plan concerning those leaving correctional facilities operated by the state of Indiana:

It is the policy of the Indiana Department of Corrections to provide case management services to create an individualized Re-Entry Accountability Plan prior to discharging offenders.

Case management coordinates the delivery of all treatment services, including the management of programs and services needed for the successful transition from incarceration to community living. This ensures a true continuum of supervision and helps to reduce recidivism through an individualized Re-Entry Accountability Plan. Case management in the correctional environment helps to 1) provide effective programs and services to meet the needs of each offender; 2) prepare the offender for a productive life within the community; 3) increase the offender's potential for successful reintegration into society; and 4) provide for the safety and security of the community.

To implement a case management process, the Department utilizes a Unit Management Team approach. Unit management is based upon the subdivision of a correctional facility into smaller units. Unit management emphasizes decentralization and delegated authority to a multi-disciplinary unit team. Unit management improves staff and offender communication and facility security.

Barriers to Affordable Housing 91.220(j)

17. Describe the actions that will take place during the next year to remove barriers to affordable housing.

To help the community as a whole overcome the barriers to affordable housing development and also maximize the impact in the community, the city of West Lafayette will strive to:

- Overcome financial barriers by seeking additional resources to create concentrated redevelopment
- Attract for-profit developers to partner with not for profit housing development agencies.
- Attract additional subsidy to assist with development for very low income households to maximize long term financial feasibility of affordable housing
- Build projects without long-term debt to help fund operations and maintenance of property

- Enlist all levels of City government to promote urban living in the central City neighborhoods
- Promote positive stories to media outlets to promote positive stories originated or about the central City neighborhoods.

Other Actions 91.220(k)

18. Describe the actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce the number of housing units containing lead-based paint hazards, reduce the number of poverty-level families develop institutional structure, enhance coordination between public and private agencies (see 91.215(a), (b), (i), (j), (k), and (l)).

19. Describe the actions to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

The city of West Lafayette will utilize the Community Development Block Grant to address the general community development needs. The primary use of these funds will be to help the economic recovery of the area and to upgrade infrastructure in the community. The following are goals and strategies to address the general community development needs.

1. Improve public infrastructure and public facilities.

Strategy	One-Year Goal	Objective	Outcome
Support beautification efforts throughout the community, targeting low to moderate-income neighborhoods	1 neighborhood	Suitable Living Environment	Availability/Accessibility
Increase the number of ramps and curb cutouts on public streets to comply with the Americans with Disabilities Act (ADA)	200 people	Suitable Living Environment	Availability/Accessibility
Support the improvement of public facilities and infrastructure.	200 people	Suitable Living Environment	Availability/Accessibility

2. Encourage economic development activities.

Strategy	One-Year Goal	Objective	Outcome
Assist businesses with façade renovations	1 business	Economic Opportunity	Sustainability

The final goal does not have specific measurable outputs. This goal instead addresses the need of the city of West Lafayette to continue its working relationship with the city of Lafayette and improve upon the current coordination efforts. Below is the goal, strategies, objectives, and outcomes.
 Improve administration and coordination between the cities of Lafayette and West Lafayette.

Strategy	Objective	Outcome
Coordinate public meetings to compliment each other's Consolidated Planning efforts and utilize all meetings as a way to provide citizen input to each other's plans	Suitable Living Environment	Sustainability
Coordinate volunteer efforts to help both communities and reach all low to moderate income census tracts	Suitable Living Environment	Sustainability
Develop stronger relationships with other HUD entitlement cities to share ideas and expertise. Use this network on a bi-annual basis to improve efforts in the local community.	Suitable Living Environment	Sustainability

PROGRAM SPECIFIC REQUIREMENTS

CDBG 91.220(I)(1)

1. Identify program income expected to be received during the program year, including:
 - amount expected to be generated by and deposited to revolving loan funds;
 - total amount expected to be received from each new float-funded activity included in this plan; and
 - amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.
2. Program income received in the preceding program year that has not been included in a statement or plan.
3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.
4. Surplus funds from any urban renewal settlement for community development and housing activities.
5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
6. Income from float-funded activities.
7. Urgent need activities, only if the jurisdiction certifies.
8. Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income.

Typically, the city of West Lafayette would estimate the amounts of each grant based on the federal budget passed in September of the previous year, in this case, September of 2010. However, the federal government has not passed a budget for the 2011 year and with numerous cuts in program dollars expected to make up for lost time, the city of West Lafayette is estimating three different funding levels. The city of West Lafayette expects funding in 2011 to be the same as 2010, 15 percent less than 2010 or 30 percent less than 2010. Projects have been contingently awarded based on the possible funding levels below.

Program	2010 Funding	2011 Funding	% Change
CDBG	\$477,115	\$399,010	-16.37%

The city of West Lafayette does not expect to reallocate funds from previous years. Twenty percent of any program income received will be allocated to administration costs and the balance will be reallocated to the other housing and social service categories. 15 percent of the total grant will be allocated to public service activities.

The city of West Lafayette approved the following activities and projects for the 2011 fiscal year. 70 percent of the activities benefit low to moderate income households and individuals, or those earning less than 80 percent of the area median income. For a family of four, the household earns less than \$48,550 per year. City Consultants and Research, LLC has included the needs addressed in the tables to show how each of the projects helps the community.

Organization	2011 Estimated Funding	
<i>Public Services - Total</i>	<i>\$59,845</i>	<i>Need Addressed</i>
Lafayette Urban Ministry	\$6,606	Support programs for the homeless or people at-risk of homelessness
Mental Health America	\$7,024	Support social service programs that help low to moderate income households
Lafayette Transitional Housing Center, Inc.	\$6,606	Support programs for the homeless or people at-risk of homelessness
Lafayette Transitional Housing Center, Inc.	\$4,097	Support programs for the homeless or people at-risk of homelessness
YWCA	\$4,766	Support programs for the homeless or people at-risk of homelessness
The Center at Jenks Rest	\$4,935	Support social service programs that help low to moderate income households
Food Finders Food Bank	\$4,097	Support programs for the homeless or people at-risk of homelessness
Riggs Community Health Center, Inc.	\$2,425	Support social service programs that help low to moderate income households
Tippecanoe County Child Care, Inc.	\$16,446	Support social service programs that help low to moderate income households
Family Services, Inc.	\$2,843	Support social service programs that help low to moderate income households and youth

<i>Admin/Housing/Infrastructure - Total</i>	<i>\$339,165</i>	<i>Need Addressed</i>
WL Dept. of Development	\$79,800	Help homeowners who have a cost burden with repairs
WL Dept. of Engineering	\$164,365	Create a suitable living environment for the disabled
WL Fire Department	\$25,000	Improve quality of public improvements for low to moderate income households
New Chauncey Housing, Inc.	\$70,000	General administration costs for the implementing the CDBG Program

HOME 91.220(I)(1)

1. Describe other forms of investment. (See Section 92.205)
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254.
2. If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).
3. Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).
4. HOME Tenant-Based Rental Assistance -- Describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program.

If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

5. If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.
6. Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.
7. Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

8. If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, state its financing guidelines required under 24 CFR 92.206(b).

The city of Lafayette administers all HOME funds on behalf the city of West Lafayette and the entire HOME Consortium. All HOME questions are answered in the city of Lafayette 2011 Action Plan.

HOPWA 91.220(I)(3)

1. One year goals for the number of households to be provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

The city of West Lafayette does not receive HOPWA funds.

OTHER NARRATIVES AND ATTACHMENTS

Include any action plan information that was not covered by a narrative in any other section. If optional tables are not used, provide comparable information that is required by consolidated plan regulations.

Fair Housing Initiatives

Neither the city of Lafayette nor the city of West Lafayette has any regulatory impediments to fair housing choice. The city has a number of positive aspects regarding fair housing choice.

- The Comprehensive Plan for the Tippecanoe County includes mixed housing to allow for greater housing choice across the county.
- Overall, Tippecanoe County does have a high amount of affordable housing available, with 63 percent of the values of homes affordable to households earning 80 percent of the median family income or less. 93 percent of the rental units are affordable to households earning 80 of the percent median family income or less.
- The Human Relations Commissions provided regular training programs to landlords over the past five years and continues to serve as advocates for fair housing choice.
- The cities of Lafayette and West Lafayette made some progress towards the goals set in the previous AI, including supporting additional homeownership training, providing articles for community outreach and including minority realtors in housing development projects.

Despite the progress made, some obstacles or impediments to fair housing still exist. The following chart outlines a variety of areas in need of improvement. The table ties each area to a specific area in this document. Each area may not have an impediment to fair housing choice

connected, but may instead be an obstacle to fair housing such as maintaining records, fair housing education or community partnerships. The cities of Lafayette and West Lafayette will utilize five years, 2010-2014, to address the impediments listed in the chart.

Area in Need of Improvement	Impediment/Obstacle	Resolution/Outcome	Date to be Completed
Compliance Data	The general population is not aware of fair housing issues or where to file complaints.	Provide user friendly information brochures and distribute through community housing development and social service agencies.	On-going: 2010-2014
Community Input	The general population, particularly the minority population, is not fully educated in the home buying process.	Support homeownership training classes.	On-going: 2010-2014
Community Input	Though undocumented, some landlords are unclear on the protected classes as part of the fair housing acts, particularly familial status.	Provide education seminars to landlords and tenants to help facilitate understanding about the requirements of fair housing and each party's responsibilities.	On-going: 2010-2014
Housing Profile	Racial disparities are prominent in the number of denials for home loans.	Contribute to the professional publications, such as those with local real estate groups to encourage fair housing practices and emphasize the importance of fair housing choice.	On-going: 2010-2014

Monitoring

Monitoring assures that recipients of federal funds are in compliance with local objectives and federal program requirements. The intent and objective of the cities is to work cooperatively with contractors and sub-recipients in the use of federal funds as best possible and within reasonable time constraints. Monitoring shall be an ongoing process with technical assistance available throughout the implementation and completion of all activities undertaken.

In accordance with Part 91.230 of the Consolidated Plan regulations, the cities issue the below statement of policy regarding a Monitoring Plan. This statement of policy describes the monitoring objectives and procedures used in the monitoring process. The cities will meet the overall monitoring objective to document and ensure compliance by annually planning and conducting review of projects and activities. Recipients deemed to be at a higher risk for non-compliance will receive an increased level of technical assistance and oversight until the concern has been resolved.

Community Development Block Grant

Part 570 governing the use of Community Development Block Grant (CDBG) funds requires that any activity, function, or program related to the use of federal funds for housing, suitable living environment, neighborhood improvements, and expanded economic opportunities, principally for low and moderate income persons, shall be monitored to ensure compliance. Monitoring for program compliance is an ongoing process of planning, implementation, communication and follow-up. Monitoring actually occurs throughout the life of a funded activity, from initial project planning to the end of long-term compliance periods. While the cities will develop and implement individual monitoring plans to best meet the needs of each community, the underlying parameters for those plans follow.

Initial Review of Project Eligibility

1. Requests for funding must be supported with an application to be reviewed for allocation recommendation. Applications include specific information regarding design of project, cost of project and beneficiaries.
2. Each activity must be eligible under related program rules and must meet one of the three national objectives -- benefit low and moderate income persons, aid in the prevention or elimination of slum and blight conditions, or meet an urgent need which threatens the health or welfare of the community.
3. An activity must be consistent with local goals and objectives as expressed in adopted policies and/or established plans and must comply with related program regulations.
4. Successfully funded applicants are required to sign a funding agreement outlining all of the requirements, regulations and standards. Funding agreements for all real property activities shall specify the acceptable use of the property, the length of the restrictive period, and disposition requirements.

Ongoing Review of Project Compliance

1. On-site monitoring will be conducted as may be deemed necessary and reasonable by the City. Desk reviews and off-site monitoring will be an ongoing activity.
2. Claims for payment are filed, with appropriate documentation, with the program manager. The program manager reviews the claim and approves it for payment.
3. Quarterly, monthly, and/or annual reports on project and activity status are required of all sub-recipients.
4. The program manager will also monitor for beneficiary compliance.
5. The Cities of Lafayette and West Lafayette program activities generally do not include program income to the sub-recipient/contractor. If this does occur, all program income shall be returned to the City for appropriate use and reporting except in those limited situations that are authorized by the City.

Follow-up and Enforcement

1. Compliance concerns are addressed at all phases of an activity, as soon as the project manager is aware of the issue. Technical assistance is provided as necessary to maintain compliance.
2. Annual reviews of sub-recipient activities are conducted by the project manager, using a checklist of areas to be reviewed. The annual reviews are followed up with written statements of compliance or non-compliance. In situations of non-compliance, the written statements detail methods and timeframes to bring the activity back into compliance.
3. Sub-recipients may be required to file a Certified Public Accountant (CPA) annual report of sub-recipient's financial stability and federally funded project expenditures. Records shall be maintained for five years after project closeout, which is when final payments and all related matters are closed.
4. Enforcement of activities not in compliance shall follow Part 85.43 with the right of appeal, as well as termination of a contract/agreement.